## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Anthony Derrick Cannon Chapter 13

Debtor

Global Lending Services, LLC. 19-00173

Movant

v. Answer

Anthony Derrick Cannon

Respondent

Charles J. Dehart, III

Trustee/Respondent

## **ANSWER**

**AND NOW**, this 7th day of July 2019, the Debtor, Anthony Derrick Cannon, by and through counsel, Dawn M. Cutaia, files this Answer to the Motion for Relief from Stay filed by Global Lending Services, LLC:

- 1. Admitted.
- Admitted.
- 3. Admitted.
- 4. Admitted.
- Admitted.
- 6. Denied. Debtor paid 931.46 in March 2019. There is no post-payment history attached to the Motion so Debtor is unsure if these funds were applied or not. In addition, the vehicle was in a car accident, was in the shop for 45 days, and Debtor paid a \$1000 deductible. Debtor paid that deductible to protect Movant's security interest and the car is repaired.
- 7. Denied.
- 8. Denied.
- 9. No response required.

**WHEREFORE**, the Debtor respectfully requests this Honorable Court deny the Motion for Relief.

Date: 7/7/2019

Respectfully Submitted,
By: /s/ Dawn M. Cutaia
Supreme Court ID 77965
Attorney for Debtor(s)
115 E. Philadelphia Street
York, PA 17401
cutaialaw@gmail.com
717-304-1841